

**REPLY DECLARATION
OF
JAMES M. BRADBURY
ATTACHMENT 19**

EXCEPTION 116

BellSouth Florida OSS Testing Evaluation

Date: November 01, 2001**EXCEPTION REPORT**

KPMG Consulting has identified an exception as a result of the POP Volume Performance Test (TVV-2).

Exception:

BellSouth representatives did not provide expected responses to Local Service Requests (LSRs) submitted by KPMG Consulting via facsimile (fax). (TVV2)

Background:

BellSouth's Business Rules for Local Ordering specifies: "A Firm Order Confirmation (FOC) will be returned to the Competitive Local Exchange Carrier (CLEC) either via facsimile or electronically after the Local Carrier Service Center (LCSC) processes the CLEC's service request(s) and determines that corrections or error resolutions are not required."¹ The Business Rules also specify that "BellSouth will return any LSR to the CLEC for clarification of the order when incomplete, incorrect, or conflicting information is present on the LSR."²

BellSouth is expected to provide accurate FOC, Clarification, or Reject responses for at least 95% of PONs.³

Issue:

KPMG Consulting submitted 54 orders via fax on October 16, 2001 to BellSouth's Atlanta LCSC as a part of the Volume Performance Test. KPMG Consulting did not receive expected responses on 13 of the 54 orders submitted. The following tables summarize the unexpected responses transmitted by BellSouth.

Table 1: Request for Resale Form on Switched Combination Order

Item	PON	VER	CC	BellSouth Response	Results
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¹ BellSouth Business Rules for Local Ordering, Issue 9Q, section 2.10.3.

² BellSouth Business Rules for Local Ordering, Issue 9Q, section 2.10.1.

³ KPMG Consulting applied standards based on its professional judgment in the absence of 1) FPSC-approved standards or 2) documented BellSouth guidelines.

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1-A	0021211CMJ110011	00	9990	Clarification requesting resale form	Resale form is not required for Reqtype of MB
1-B	0021211CMJ110012	00	9990	Clarification requesting resale form	Resale form is not required for Reqtype of MB
1-C	0021211CMJ110013	00	9990	Clarification requesting resale form	Resale form is not required for Reqtype of MB

Table 2: FOC Due Date Earlier Than LSR Desired Due Date					
Item	PON	VER	CC	BellSouth Response	Results
2-A	0021211CMJ110004	00	9990	FOC	FOC DD=10/11/2000, DDD=11/10/2001
2-B	0720111CMH110010	00	9991	FOC	FOC DD=10/09/2001, DDD=11/10/2001
2-C	0720111CMH110023	00	9991	FOC	FOC DD=11/01/2001, DDD=11/10/2001

Table 3: Apparent Business Rules Conflicts					
Item	PON	VER	CC	BellSouth Response	Results
3-A	0020821CMJ110008	00	9990	Clarification requesting that all changes, including Line Class of Service, be listed on order	Business rules do not require Line Class of Service for Reqtype M, ACT V, LNA V
3-B	0021211CMJ110001	00	9990	Clarification stating that bill information was missing	All required billing information on the order was provided correctly

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3-C	0021211CMJ110007	00	9990	Clarification requesting desired USOCs	Business rules do not require any USOCs for Rectype M, ACT V, LNA V
3-D	0021211CMJ110010	00	9990	Clarification stating "sai must provide class of svc"	Business rules do not require Line Class of Service for Rectype M, ACT V, LNA V
3-E	0021211CMJ110019	00	9990	Clarification requesting information on changes being made	Business rules do not require Changes for Rectype M, ACT V, LNA V
3-F	0021211CMJ110020	00	9990	Clarification requesting that all changes, including Line Class of Service, be listed on order	Business rules do not require Line Class of Service for Rectype M, ACT V, LNA V

Table 4: Received FOC on Orders That Contained an Intentional Error

Item	PON	VER	CC	BellSouth Response	Results
4-A	0021211CMJ110003	00	9990	FOC	Order listed an invalid Billing Account Number
4-B	0720111CMH110010	00	9991	FOC	Order listed an invalid ACTL

Impact:

Inconsistent BellSouth confirmations and errors can create extra work for a CLEC requiring the CLEC to follow up on unexpected responses. In addition, inconsistent confirmations can negatively impact the timeliness of order completion and lower overall CLEC customer satisfaction.